

October 27, 2003

To Whom It May Concern:

I've recently seen some discussion about the previous consultant that JCICS used to evaluate using COA or setting up its own accreditation process. In 1997-98, I was this person who served as consultant to the Council. I had previously served 5 years on the Board of COA and been actively involved in accreditation issues on a national level for 12 years. For the sake of clarifying the discussion, here is an historical perspective.

After an extensive survey of JCICS members, my recommendation at the JCICS meeting in 1998 was that JCICS set up its own process for accreditation. This recommendation was made in spite of a very high regard that I hold for COA. However, I thought that JCICS could retain more control over the standards as well as the accreditation process by doing it themselves. I also thought it was economically feasible to set up such a system. It would now seem that JCICS has missed the opportunity to set up such a system because of how the Hague regs have been written to define and limit the type of organization which can do the accreditation. If state licensing is used, it should be used nationwide, rather than in a few states. However, many states are in a budget crunch and will be reluctant to take on new duties and obligations. Why did the Council agree to use COA instead of its own accreditation system? Back in 1998, COA agreed to set up a separate process for Hague accreditation and was not going to require an agency to undergo full COA accreditation in order to get "Hague accredited" only. Judith Hines from COA was present and encouraged the Council to adopt COA, especially with the provision of a smaller, streamlined system for just Hague accreditation. Her offer was very attractive, but I knew that there would be pressure within the COA system for there not to be a separate, smaller process to accredit just one type of service. To allow one group like JCICS to set up a special accreditation program within the larger COA accreditation process would not be accepted by other sponsoring organizations, whose members are required to do full COA accreditation.

When an agency is accredited by COA, it must be accredited for ALL services it offers for which COA has standards. This means that an agency that does both domestic and international adoption, would not be able to accredit one service without doing both. While there was a brief period when COA did do the specialized "Hague accreditation" the direction now seems for COA to go back to the regular system where there would not be a separate accreditation process within COA for Hague. This increases the burden significantly for small agencies which are seeking to undergo the accreditation process. Both cost and agency time to prepare for accreditation will be very high.

Having been part of the then National Association of Homes and Services for Children, I was highly involved when NAHSC merged its own existing accreditation program into COA in 1984 to 1987. Now after 15 years, only the larger agencies are the ones from the former NAHSC that are accredited today. I predict this will be the same trend within JCICS. The regs for Hague appear to have been written in such a way that larger agencies will be the only ones which will be doing international adoption 10 years from now. The smaller agencies will find it difficult if not impossible to pay the liability insurance let alone the cost and work of

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accreditation. Since I am with a small adoption agency, I hope that my prediction is wrong, but I am not encouraged by the proposed Hague regs.

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